

1 [Submitting Counsel on Signature Page]
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates To:

Breathitt County Board of Education v. Meta Platforms, Inc., et al.

Tucson Unified School District v. Meta Platforms, Inc., et al.

Charleston County School District v. Meta Platforms, Inc., et al.

Irvington Public Schools v. Meta Platforms, Inc., et al.

Dekalb County School District v. Meta Platforms, Inc., et al.

Board of Education of Harford County v. Meta Platforms, Inc., et al.

No. 4:22-md-03047-YGR

MDL No. 3047

**DECLARATION OF MELISSA L. YEATES
IN SUPPORT OF SCHOOL
DISTRICT/LOCAL GOVERNMENT
ENTITY PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE
TESTIMONY OF SCHOOL DISTRICT
EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

1 I, Melissa L. Yeates, of full age and duly sworn according to law, declare:

2 I am an attorney admitted to practice law in Pennsylvania, Delaware, and New York and
 3 admitted *pro hac vice* in this Court. I am a Partner with the law firm of Kessler Topaz Meltzer &
 4 Check, LLP, and I serve as Co-Chair of the Local Government Entity and School District
 5 Subcommittee in the above-captioned litigation. I submit this Declaration in support of the School
 6 District Plaintiffs' Opposition to Defendants' Motion to Exclude Testimony of School District
 7 Experts, filed concurrently herewith. I have personal knowledge of the facts stated in this
 8 Declaration, and if called upon to do so, could and would competently testify thereto.

9 1. Attached as **Exhibit 1** is a true and correct copy of the May 16, 2025 Expert Report
 10 of Dimitri Christakis, M.D., M.P.H.

11 2. Attached as **Exhibit 2** is a true and correct copy of the May 16, 2025 Expert Report
 12 of Gary Goldfield, Ph.D.

13 3. Attached as **Exhibit 3** is a true and correct copy of the May 16, 2025 Expert Report
 14 of Anna Lembke, M.D.

15 4. Attached as **Exhibit 4** is a true and correct copy of the May 16, 2025 Expert Report
 16 of Dr. Ramin Mojtabai, M.D., Ph.D., MPH.

17 5. Attached as **Exhibit 5** is a true and correct copy of the May 16, 2025 Expert Report
 18 of Eva Telzer, Ph.D.

19 6. Attached as **Exhibit 6** is a true and correct copy of the May 18, 2025 Expert Report
 20 of Robert Klein for Breathitt County School District.

21 7. Attached as **Exhibit 7** is a true and correct copy of the May 18, 2025 Expert Report
 22 of Robert Klein for Charleston County School District.

23 8. Attached as **Exhibit 8** is a true and correct copy of the May 18, 2025 Expert Report
 24 of Robert Klein for DeKalb County School District.

25 9. Attached as **Exhibit 9** is a true and correct copy of the May 18, 2025 Expert Report
 26 of Robert Klein for Board of Education of Harford County.

27 10. Attached as **Exhibit 10** is a true and correct copy of the May 18, 2025 Expert Report
 28 of Robert Klein for Irvington Public Schools.

1 11. Attached as **Exhibit 11** is a true and correct copy of the May 18, 2025 Expert Report
 2 of Robert Klein for Tucson Unified School District.

3 12. Attached as **Exhibit 12** is a true and correct copy of the August 1, 2025 Rebuttal
 4 Report of Robert Klein for Breathitt County School District.

5 13. Attached as **Exhibit 13** is a true and correct copy of the August 1, 2025 Rebuttal
 6 Report of Robert Klein for Charleston County School District.

7 14. Attached as **Exhibit 14** is a true and correct copy of the August 1, 2025 Rebuttal
 8 Report of Robert Klein for DeKalb County School District.

9 15. Attached as **Exhibit 15** is a true and correct copy of the August 1, 2025 Rebuttal
 10 Report of Robert Klein for Board of Education of Harford County.

11 16. Attached as **Exhibit 16** is a true and correct copy of the August 1, 2025 Rebuttal
 12 Report of Robert Klein for Irvington Public Schools.

13 17. Attached as **Exhibit 17** is a true and correct copy of the August 1, 2025 Rebuttal
 14 Report of Robert Klein for Tucson Unified School District.

15 18. Attached as **Exhibit 18** is a true and correct copy of the September 5, 2025 deposition
 16 transcript of Robert Klein.

17 19. Attached as **Exhibit 19** is a true and correct copy of the March 21, 2025 warming
 18 email for Breathitt County School District, Bates stamped Klein000006.

19 20. Attached as **Exhibit 20** is a true and correct copy of the April 3, 2025 warming email
 20 reminder for Breathitt County School District, Bates stamped Klein000007- Klein000008.

21 21. Attached as **Exhibit 21** is a true and correct copy of the April 22, 2025 warming email
 22 reminder for Breathitt County School District, Bates stamped Klein000009-Klein000010.

23 22. Attached as **Exhibit 22** is a true and correct copy of the April 7, 2025, April 21, 2025,
 24 and April 24, 2025 warming email and warming email reminders for Charleston County School
 25 District, Bates stamped Klein0000011-Klein0000013.

26 23. Attached as **Exhibit 23** is a true and correct copy of the April 3, 2025 warming email
 27 for DeKalb County School District, Bates stamped Klein000014.

1 24. Attached as **Exhibit 24** is a true and correct copy of the April 14, 2025 warming email
 2 reminder for DeKalb County School District, Bates stamped Klein000015- Klein000016.

3 25. Attached as **Exhibit 25** is a true and correct copy of the April 23, 2025 warming email
 4 reminder for DeKalb County School District, Bates stamped Klein000017-Klein000018.

5 26. Attached as **Exhibit 26** is a true and correct copy of the warming email for Board of
 6 Education of Harford County, Bates stamped Klein000019.

7 27. Attached as **Exhibit 27** is a true and correct copy of the March 27, 2025 warming
 8 email for Irvington Public Schools, Bates stamped Klein000020- Klein000021.

9 28. Attached as **Exhibit 28** is a true and correct copy of the April 4, 2025 warming email
 10 reminder for Irvington Public Schools, Bates stamped Klein000022- Klein000024.

11 29. Attached as **Exhibit 29** is a true and correct copy of the April 1, 2025 warming email
 12 for Tucson Unified School District, Bates stamped Klein000025.

13 30. Attached as **Exhibit 30** is a true and correct copy of the April 22, 2025 warming email
 14 reminder for Tucson Unified School District, Bates stamped Klein000026.

15 31. Attached as **Exhibit 31** is a true and correct copy of the article *Gender Differences in*
 16 *Careers, Education, and Games* (2008), authored by Claudia Goldin and Lawrence F. Katz.

17 32. Attached as **Exhibit 32** is a true and correct copy of the article *Virtual Rituals:*
 18 *Community, Emotion, and Ritual in Massive Multiplayer Online Role-playing Games—A*
 19 *Quantitative Test and Extension of Structural Ritualization Theory* (2018), authored by Joseph M.
 20 Simpson, J. D. Knottnerus, and Michael J. Stern.

21 33. Attached as **Exhibit 33** is a true and correct copy of the September 2, 2025 Second
 22 Amended Expert Report of Dr. Bryce Ward for Breathitt County Schools.

23 34. Attached as **Exhibit 34** is a true and correct copy of the September 2, 2025 Second
 24 Amended Expert Report of Dr. Bryce Ward for Charleston County School District.

25 35. Attached as **Exhibit 35** is a true and correct copy of the August 8, 2025 Amended
 26 Expert Report of Dr. Bryce Ward for DeKalb County School District.

27 36. Attached as **Exhibit 36** is a true and correct copy of the August 8, 2025 Amended
 28 Expert Report of Dr. Bryce Ward for Harford County Public Schools.

1 37. Attached as **Exhibit 37** is a true and correct copy of the May 31, 2025 Amended
 2 Expert Report of Dr. Bryce Ward for Irvington Public Schools.

3 38. Attached as **Exhibit 38** is a true and correct copy of the May 19, 2025 Expert Report
 4 of Dr. Bryce Ward for Tucson Unified School District.

5 39. Attached as **Exhibit 39** is a true and correct copy of the July 31, 2025 Expert Reply
 6 Report of Dr. Bryce Ward for Breathitt County Schools.

7 40. Attached as **Exhibit 40** is a true and correct copy of the July 31, 2025 Expert Reply
 8 Report of Dr. Bryce Ward for Charleston County School District.

9 41. Attached as **Exhibit 41** is a true and correct copy of the July 31, 2025 Expert Reply
 10 Report of Dr. Bryce Ward for DeKalb County School District.

11 42. Attached as **Exhibit 42** is a true and correct copy of the July 31, 2025 Expert Reply
 12 Report of Dr. Bryce Ward for Harford County Public Schools.

13 43. Attached as **Exhibit 43** is a true and correct copy of the July 31, 2025 Expert Reply
 14 Report of Dr. Bryce Ward for Irvington Public Schools.

15 44. Attached as **Exhibit 44** is a true and correct copy of the July 31, 2025 Expert Reply
 16 Report of Dr. Bryce Ward for Tucson Unified School District.

17 45. Attached as **Exhibit 45** is a true and correct copy of the August 15, 2025 deposition
 18 transcript of Dr. Bryce Ward.

19 46. Attached as **Exhibit 46** is a true and correct copy of the May 13, 2025 Affidavit of
 20 Dr. April Vauss.

21 47. Attached as **Exhibit 47** is a true and correct copy of the May 16, 2025 Affidavit of
 22 Sandra Lopez.

23 48. Attached as **Exhibit 48** is a true and correct copy of the May 15, 2025 Affidavit of
 24 Will Noble.

25 49. Attached as **Exhibit 49** is a true and correct copy of the May 2, 2025 Affidavit of
 26 Daphne Noble.

27 50. Attached as **Exhibit 50** is a true and correct copy of the May 9, 2025 Affidavit of
 28 Jeremy Hall.

1 51. Attached as **Exhibit 51** is a true and correct copy of the May 5, 2025 Affidavit of
 2 Phillip Watts.

3 52. Attached as **Exhibit 52** is a true and correct copy of the May 9, 2025 Affidavit of
 4 Kera Howard.

5 53. Attached as **Exhibit 53** is a true and correct copy of the May 12, 2025 Affidavit of
 6 Brian Lambert.

7 54. Attached as **Exhibit 54** is a true and correct copy of the May 13, 2025 Affidavit of
 8 Julie Shivanonda.

9 55. Attached as **Exhibit 55** is a true and correct copy of the May 13, 2025 Affidavit of
 10 Holly Hammel.

11 56. Attached as **Exhibit 56** is a true and correct copy of the May 13, 2025 Affidavit of
 12 Dr. Sabrina Salmon.

13 57. Attached as **Exhibit 57** is a true and correct copy of the May 12, 2025 Affidavit of
 14 Anita Huggins.

15 58. Attached as **Exhibit 58** is a true and correct copy of the May 15, 2025 Affidavit of
 16 Lisa Kathryn Allison.

17 59. Attached as **Exhibit 59** is a true and correct copy of the May 14, 2025 Affidavit of
 18 Daniel Prentice.

19 60. Attached as **Exhibit 60** is a true and correct copy of the May 16, 2025 Affidavit of
 20 Monika Davis.

21 61. Attached as **Exhibit 61** is a true and correct copy of the May 7, 2025 30(b)(1)
 22 deposition transcript of Bernard Hennigan.

23 62. Attached as **Exhibit 62** is a true and correct copy of the May 8, 2025 30(b)(1)
 24 deposition transcript of Donoven Brooks.

25 63. Attached as **Exhibit 63** is a true and correct copy of the May 19, 2025 Expert Report
 26 of Jeffrey Meyers for Breathitt County Board of Education.

27 64. Attached as **Exhibit 64** is a true and correct copy of the May 19, 2025 Expert Report
 28 of Jeffrey Meyers for Charleston County School District.

1 65. Attached as **Exhibit 65** is a true and correct copy of the May 19, 2025 Expert Report
 2 of Jeffrey Meyers for DeKalb County School District.

3 66. Attached as **Exhibit 66** is a true and correct copy of the May 19, 2025 Expert Report
 4 of Jeffrey Meyers for Board of Education of Harford County.

5 67. Attached as **Exhibit 67** is a true and correct copy of the May 19, 2025 Expert Report
 6 of Jeffrey Meyers for Irvington Public Schools.

7 68. Attached as **Exhibit 68** is a true and correct copy of the May 19, 2025 Expert Report
 8 of Jeffrey Meyers for Tucson Unified School District.

9 69. Attached as **Exhibit 69** is a true and correct copy of the July 25, 2025 Expert Reply
 10 Report of Jeffrey Meyers for Breathitt County Board of Education.

11 70. Attached as **Exhibit 70** is a true and correct copy of the July 25, 2025 Expert Reply
 12 Report of Jeffrey Meyers for Charleston County School District.

13 71. Attached as **Exhibit 71** is a true and correct copy of the July 25, 2025 Expert Reply
 14 Report of Jeffrey Meyers for DeKalb County School District.

15 72. Attached as **Exhibit 72** is a true and correct copy of the July 25, 2025 Expert Reply
 16 Report of Jeffrey Meyers for Board of Education of Harford County.

17 73. Attached as **Exhibit 73** is a true and correct copy of the July 25, 2025 Expert Reply
 18 Report of Jeffrey Meyers for Irvington Public Schools.

19 74. Attached as **Exhibit 74** is a true and correct copy of the July 25, 2025 Expert Reply
 20 Report of Jeffrey Meyers for Tucson Unified School District.

21 75. Attached as **Exhibit 75** is a true and correct copy of the August 22, 2025 deposition
 22 transcript of Jeffrey Meyers.

23 76. Attached as **Exhibit 76** is a true and correct copy of Plaintiff Board of Education of
 24 Harford County's Amended Responses and Objections to Defendants' Interrogatories (Set 3), dated
 25 April 14, 2025.

26 77. Attached as **Exhibit 77** is a true and correct copy of Plaintiff Irvington Public
 27 Schools' Third Amended Answers to Defendants' Interrogatories (Set 3), dated May 14, 2025.

1 78. Attached as **Exhibit 78** is a true and correct copy of Plaintiff Tucson Unified School
 2 District's Second Amended Answers to Defendants' Interrogatories (Set 3), dated May 15, 2025.

3 79. Attached as **Exhibit 79** is a true and correct copy of the May 16, 2025 Expert Report
 4 of Dr. Sharon Hoover.

5 80. Attached as **Exhibit 80** is a true and correct copy of the June 20, 2025 Amended
 6 Expert Report of Dr. Sharon Hoover for Breathitt County Board of Education.

7 81. Attached as **Exhibit 81** is a true and correct copy of the June 20, 2025 Amended
 8 Expert Report of Dr. Sharon Hoover for Charleston County School District.

9 82. Attached as **Exhibit 82** is a true and correct copy of the June 20, 2025 Amended
 10 Expert Report of Dr. Sharon Hoover for DeKalb County Schools.

11 83. Attached as **Exhibit 83** is a true and correct copy of the June 20, 2025 Amended
 12 Expert Report of Dr. Sharon Hoover for Board of Education Harford County.

13 84. Attached as **Exhibit 84** is a true and correct copy of the June 20, 2025 Amended
 14 Expert Report of Dr. Sharon Hoover for Irvington Public Schools.

15 85. Attached as **Exhibit 85** is a true and correct copy of the June 20, 2025 Amended
 16 Expert Report of Dr. Sharon Hoover for Tucson Unified School District.

17 86. Attached as **Exhibit 86** is a true and correct copy of the July 30, 2025 Rebuttal Report
 18 of Dr. Sharon Hoover.

19 87. Attached as **Exhibit 87** is a true and correct copy of the August 7, 2025 Amended
 20 Rebuttal Report of Dr. Sharon Hoover for Breathitt County Board of Education.

21 88. Attached as **Exhibit 88** is a true and correct copy of the August 1, 2025 Rebuttal
 22 Report of Dr. Sharon Hoover for Charleston County School District.

23 89. Attached as **Exhibit 89** is a true and correct copy of the August 7, 2025 Amended
 24 Rebuttal Report of Dr. Sharon Hoover for DeKalb County School District.

25 90. Attached as **Exhibit 90** is a true and correct copy of the August 1, 2025 Rebuttal
 26 Report of Dr. Sharon Hoover for Harford County Public Schools.

27 91. Attached as **Exhibit 91** is a true and correct copy of the August 7, 2025 Amended
 28 Rebuttal Report of Dr. Sharon Hoover for Irvington Public Schools.

1 92. Attached as **Exhibit 92** is a true and correct copy of the August 7, 2025 Amended
 2 Rebuttal Report of Dr. Sharon Hoover for Tucson Unified School District.

3 93. Attached as **Exhibit 93** is a true and correct copy of the August 12, 2025 deposition
 4 transcript volume 1 of Dr. Sharon Hoover.

5 94. Attached as **Exhibit 94** is a true and correct copy of the August 13, 2025 deposition
 6 transcript volume 2 of Dr. Sharon Hoover.

7 95. Attached as **Exhibit 95** is a true and correct copy of the April 8, 2025 30(b)(6)
 8 deposition transcript of Julie Shivanonda.

9 96. Attached as **Exhibit 96** is a true and correct copy of the September 4, 2025 Second
 10 Amended Expert Report of Dr. Douglas Leslie for Breathitt County Board of Education.

11 97. Attached as **Exhibit 97** is a true and correct copy of the September 4, 2025 Second
 12 Amended Expert Report of Dr. Douglas Leslie for Charleston County School District.

13 98. Attached as **Exhibit 98** is a true and correct copy of the September 4, 2025 Second
 14 Amended Expert Report of Dr. Douglas Leslie for DeKalb County School District.

15 99. Attached as **Exhibit 99** is a true and correct copy of the September 4, 2025 Second
 16 Amended Expert Report of Dr. Douglas Leslie for Board of Education of Harford County.

17 100. Attached as **Exhibit 100** is a true and correct copy of the September 4, 2025 Second
 18 Amended Expert Report of Dr. Douglas Leslie for Irvington Public Schools.

19 101. Attached as **Exhibit 101** is a true and correct copy of the September 4, 2025 Second
 20 Amended Expert Report of Dr. Douglas Leslie for Tucson Unified School District.

21 102. Attached as **Exhibit 102** is a true and correct copy of the August 1, 2025 Rebuttal
 22 Report of Dr. Douglas Leslie for Breathitt County Board of Education

23 103. Attached as **Exhibit 103** is a true and correct copy of the August 1, 2025 Rebuttal
 24 Report of Dr. Douglas Leslie for Charleston County School District.

25 104. Attached as **Exhibit 104** is a true and correct copy of the August 1, 2025 Rebuttal
 26 Report of Dr. Douglas Leslie for DeKalb County School District.

27 105. Attached as **Exhibit 105** is a true and correct copy of the August 1, 2025 Rebuttal
 28 Report of Dr. Douglas Leslie for Board of Education of Harford County.

1 106. Attached as **Exhibit 106** is a true and correct copy of the August 1, 2025 Rebuttal
 2 Report of Dr. Douglas Leslie for Irvington Public Schools.

3 107. Attached as **Exhibit 107** is a true and correct copy of the August 1, 2025 Rebuttal
 4 Report of Dr. Douglas Leslie for Tucson Unified School District.

5 108. Attached as **Exhibit 108** is a true and correct copy of the September 11, 2025
 6 Amended Expert Report of Brian Osborne.

7 109. Attached as **Exhibit 109** is a true and correct copy of the September 11, 2025
 8 Amended Expert Rebuttal report of Brian Osborne.

9 110. Attached as **Exhibit 110** is a true and correct copy of the September 4, 2025
 10 deposition transcript of Brian Osborne.

11 111. Attached as **Exhibit 111** is a true and correct copy of Brian Osborne's curriculum
 12 vitae, marked as Exhibit 1 at the September 4, 2025 deposition of Brian Osborne.

13 112. Attached as **Exhibit 112** is a true and correct copy of the article *Social media use*
 14 *associated with depression among US young adults* (2016) authored by the University of Pittsburgh
 15 Schools of the Health Sciences, marked as Exhibit 19 at the September 4, 2025 deposition of Brian
 16 Osborne.

17 113. Attached as **Exhibit 113** is a true and correct copy of the article *How Money Matters*
 18 *for Schools* (2017) authored by Bruce D. Baker, marked as Exhibit 20 at the September 4, 2025
 19 deposition of Brian Osborne.

20 114. Attached as **Exhibit 114** is a true and correct copy of Plaintiff Charleston County
 21 School District's Supplemental Answers to Defendants' Interrogatories (Set 3), dated April 23,
 22 2025.

23 115. Attached as **Exhibit 115** is a true and correct copy of Plaintiff DeKalb County School
 24 District's Amended Objections and Responses to Defendants' Interrogatories (Set 3), dated March
 25 24, 2025.

26 116. Attached as **Exhibit 116** is a true and correct copy of Jeffrey Meyer deposition errata
 27 sheet, dated October 9, 2025.

1 I declare under penalty of perjury, under the laws of the United States that the foregoing is
2 true and accurate. This declaration was executed on November 7, 2025, in Radnor, Pennsylvania.
3
4

5 Dated: November 7, 2025

6 */s/ Melissa L. Yeates*

7 Melissa L. Yeates

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28